

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA

DOCKET NO. 2019-224-E
DOCKET NO. 2019-225-E

In the Matter of:)	DUKE ENERGY CAROLINAS,
)	LLC’S AND DUKE ENERGY
South Carolina Energy Freedom Act)	PROGRESS, LLC’S THIRD SET OF
(H.3659) Proceeding Initiated Pursuant to)	REQUESTS FOR PRODUCTION OF
S.C. Code Ann. Section 58-37-40 and)	DOCUMENTS AND
Integrated Resource Plans for Duke)	INTERROGATORIES TO VOTE
Energy Carolinas, LLC and Duke Energy)	SOLAR
Progress, LLC)	

Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP”) (together, “Duke Energy” or the “Companies”), by and through their legal counsel, pursuant to Rule 103-833 of the Rules of Practice and Procedure of the South Carolina Public Service Commission, hereby serve Vote Solar (“Vote Solar”) with the following Third Set of Requests for Production and Interrogatories to be answered under oath on or before twenty (20) days from the date of service.

Further, please take notice that these Requests for Production and Interrogatories are continuing in nature until the date of the hearing, and that any information or responsive materials identified after your responses have been served upon the undersigned counsel should be provided via supplemental discovery responses as soon as possible after such identification.

INSTRUCTIONS

1. Please produce the requested documents as they are kept in the usual course of business or organize and label them to correspond with the categories in the Request. Documents attached to each other should not be separated.

2. In producing Documents, furnish all documents known or available to you, regardless of whether such documents are possessed directly by you or your agents, employees, representatives, investigators, or by your attorneys. All requests for Documents specifically request documents of Vote Solar as well as agents or consultants that Vote Solar has retained to provide expert testimony in this proceeding.

3. If any document otherwise responsive to any Request was, but is no longer, in your possession, subject to your control or in existence, identify each document by listing its author(s) and addressee(s), date, subject matter, whether the document(s) or copies are still in existence (and if so, their locations and the custodians), as well as whether the document is missing or lost, has been destroyed, has been transferred voluntarily to others, or has been otherwise disposed of. In each instance, explain the circumstances surrounding such disposition and identify the person(s) directing or authorizing its destruction or transfer, and the date(s) of such direction or authorization.

4. If a privilege or objection as to any Request is claimed, identify with specificity the matter as to which the privilege or objection is claimed, the nature of the privilege or objection, the legal and factual basis for each such claim, and a complete description of the information or document being withheld.

5. Unless otherwise stated, the relevant time period for these Requests is from January 1, 2018, until the present.

6. Each Request shall be reproduced at the beginning of the response thereto.
7. Please provide copies of the information responsive to each Request in native electronic working format with all data and formulas intact.
8. Please provide responses to the following data requests electronically. To the extent this is impracticable, the responses, including any responsive Documents, should be provided at the offices of Robinson, Gray, Stepp & Laffitte, LLC, 1310 Gadsden Street, Columbia, South Carolina 29201, or some mutually convenient location otherwise agreed to by the parties.

DEFINITIONS

1. **“Commission”** means the Public Service Commission of South Carolina.
2. **“Communication”** means the transmittal of information in the form of facts, ideas, Documents, inquiries, or otherwise, including every discussion, conversation, conference, or telephone call.
3. **“You”** and **“your”** means Vote Solar, Vote Solar’s witness(es) and consultant(s) in this proceeding, including, but not limited to Tyler Fitch, and all of its members, agents, representatives and attorneys.
4. **“Dockets”** means Commission Docket Nos. 2019-224-E & 2019-225-E.
5. The term **“document”** is to be construed as broadly as permissible under Rule 34 of the South Carolina Rules of Civil Procedure and includes, but is not limited to, any printed, typewritten, handwritten or otherwise recorded information of whatever character, including, but not limited to, letters, memoranda, notes, diaries, reports, records, calendars, charts, audio and/or video tapes or discs, and photographs; computer programs

or disks; electronic media records, however recorded and maintained, including, but not limited to, electronic mail, voicemail messages, digital photographs and electronically scanned records of any type; recorded observations, statements, conversations or formal affidavits. Any carbon or photocopy of any such materials upon which notations have been made and all drafts are also included.

6. **“Person”** means any natural person or any business, legal, or governmental entity or association.

7. The terms **“related to”** and **“relating to”** or any variation thereof shall be construed to include refer to, summarize, reflect, constitute, contain, embody, mention, show, comprise, evidence, discuss, describe, comment on, concerning, regarding, eluding to, pertaining to, probative of, in connection with, dealing with, in respect of, about, involved, identifying or proving.

8. **“Identify,”** when referring to a Person, means to give, to the extent known, the Person’s full name, present or last known address, and when referring to a natural Person, additionally, the present or last known place of employment.

9. **“Identify,”** when referring to Documents, means to give, to the extent known, the (i) type of Document; (ii) general subject matter; (iii) date of the Document; and (iv) authors addressees and recipients.

10. **“Identify,”** when referring to an oral Communication, means to give, to the extent known, the identity of the speaker and of each Person who was present when the Communication was spoken, and the substance, date, and place of such Communication.

INTERROGATORIES

3-1. Please state whether any of the analytical approaches used in the “Carbon Stranding Briefing: Risks of Carbon Stranding in Duke Energy’s Modified 2020 Integrated Resource Plan” (the “Carbon Stranding Briefing”) authored by Tyler Fitch, Regulatory Director, Southeast at Vote Solar, have been updated from the original analysis presented in Mr. Fitch’s “Carbon Stranding: Climate Risk and Stranded Assets in Duke’s Integrated Resource Plan.” If so, please explain what aspects of the analytical methods were updated and describe the reason for the change.

ANSWER:

3-2. Please provide the assumed emissions and capacity factors for all existing and new resources used in the Carbon Stranding Briefing.

ANSWER:

3-3. Please confirm that the projected emissions of the resource portfolio set forth in the Carbon Stranding Briefing are not influenced by other resources on the system, including new renewable energy.

ANSWER:

3-4. Please provide the unit-by-unit date of retirement used in the Carbon Stranding Briefing.

ANSWER:

REQUESTS FOR PRODUCTION

3-1. Please produce any and all documents identified, referred to, or relied upon in preparing your response to Duke Energy's Third Set of Interrogatories to Vote Solar.

RESPONSE:

3-2. Please produce all documents, including, but not limited to, all workpapers and/or quantitative analysis developed by you or others and that are used to support the analysis and/or conclusions presented in the Carbon Stranding Briefing.

RESPONSE:

3-3. Please provide the financial stranding cost analysis work papers used to develop the stranding costs of \$6 billion and the \$1,100 one-time cost to residential customers referenced on page 4 of the Carbon Stranding Briefing. Please include the data used to create the Graph entitled "Comparing 2020 and Modified IRP Stranding Costs."

RESPONSE:

Dated this 29th day of October 2021.



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